

Message Text

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ACTION EUR-12

INFO OCT-01 ISO-00 ACDA-10 CEQ-01 CIAE-00 DOTE-00 EPA-04

HEW-06 HUD-02 INR-07 INT-05 L-03 NSAE-00 NSC-05

NSF-02 OIC-02 PA-02 PM-04 PRS-01 SAJ-01 OES-06 SP-02

SS-15 TRSE-00 USIA-15 FEAE-00 ERDA-07 CG-00 AF-06

ARA-10 EA-09 NEA-10 IO-13 ERDE-00 EURE-00 /161 W

----- 066552

P R 141819Z APR 76

FM AMEMBASSY LONDON

TO SECSTATE WASHDC PRIORITY 0807

INFO USMISSION NATO BRUSSELS

UNCLAS SECTION 01 OF 04 LONDON 05831

E.O. 11652: N/A

TAGS: CCMS. ENRG, SENV, UK

SUBJECT: CCMS: APRIL 27-28, 1976 PLENARY SESSION:

UK ROUND TABLE REPORT

REF: STATE 81206

FCO PROVIDED EMBASSY WITH COPY UK ROUND TABLE REPORT

APR 14. TEXT FOLLOWS:

1. IN THE HIGHLY MECHANIZED, HIGHLY URBANIZED SOCIETY
IN WHICH WE LIVE, EVEN THE MOST ARDENT ANTI-POLLUTION
LOBBY WOULD CONCEDE THAT THE ABSOLUTE ELIMINATION OF
EMISSIONS. EFFLUENTS AND CONTAMINATION, IF NOT IMPOSS-
IBLE. WOULD BE AT A COST SO GREAT THAT NO COUNTRY COULD
CONTEMPLATE SUCH AN UNDERTAKING. IN THE VIEW OF THE UK.
THE ENVIRONMENT CAN BE REGARDED AS A RESOURCE - IT HAS A
CAPACITY FOR THE ABSORPTION. DISPERSION AND DEGRADATION
OF POLLUTANTS. THIS CAPABILITY IS IMPORTANT. AND ITS
USE SHOULD BE OPTIMIZED AND NOT OVERSTRETCHED. IN DE-
CIDING HOW TO DEAL WITH POLLUTION HAZARDS, CONSIDERA-
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TIONS OF RISK - AND OF WHAT LEVELS OF RISK ARE OR ARE

-NOT ACCEPTABLE - ARE OF THE ESSENCE.

2. IT IS CLEAR THAT MAN IS CONFRONTED BY AN INCREASINGLY DIVERSE RANGE OF FOREIGN CHEMICAL COMPOUNDS DISCHARGED INTO THE ENVIRONMENT BY HIM. SOME OF WHICH MAY CONSTITUTE HAZARDS TO HIS HEALTH IN THE SHORT OR LONG TERM. THEY ALSO OFFER POTENTIAL INSULT TO FLORA AND FAUNA. AND MAY UPSET THE DELICATELY BALANCED CYCLES OF OUR PHYSICAL ENVIRONMENT; HERE THE DAMAGE CAN RANGE FROM AN INSULT TO AESTHETIC VALUES OR THE LOSS OF AN AMENITY TO THE OUTRIGHT DESTRUCTION OF SPECIES.

3. HOW IS RISK DETERMINED? INCREASING SOPHISTICATION OF MONITORING AND DETECTION TECHNIQUES HAS LED TO THE IDENTIFICATION OF LOW LEVELS OF POLLUTANT IN UNEXPECTED SECTORS OF THE ENVIRONMENT. THE QUESTIONS WHICH FOLLOW MAY BE OBVIOUS, BUT THE ANSWERS REMAIN UNCERTAIN. DO SUCH LEVELS CONSTITUTE HAZARDS? WHAT IS THE DEGREE OF RISK? SHOULD COSTLY MEASURES BE TAKEN AGAINST EVERY SINGLE ONE ON THE BASIS OF A SUSPECTED POTENTIAL FOR HARM? IF NOT HOW DO WE DETERMINE WHEN AND WHERE TO INTERVENE?

4. THERE ARE TWO ASPECTS TO THE PROBLEM - FIRSTLY HOW DOES ONE MAKE AN ASSESSMENT OF THE POTENTIAL HAZARD? SECONDLY. WHERE SHOULD THE LINE BE DRAWN IN POLLUTION CONTROL - WHAT IS AN ACCEPTABLE LEVEL OF RISK? A SIMPLISTIC ANSWER TO THE LATTER EXISTS IN TERMS OF ECONOMIC THEORY: "POLLUTION SHOULD BE ABATED TO THE POINT WHERE THE EXTRA BENEFIT TO SOCIETY FROM FURTHER ABATEMENT JUST EQUALS THE EXTRA COST TO SOCIETY OF THIS ABATEMENT." (ROYAL COMMISSION ON ENVIRONMENTAL POLLUTION, 5TH REPORT, 1976). THE DIFFICULT QUESTION RAISED BY THIS IS. OF COURSE. THE QUANTIFICATION OF THE COST/BENEFIT/RISK EQUATION.

5. WHAT VALUE CAN BE PLACED ON LIFE? FINANCIAL VALUES HAVE BEEN PUT ON HUMAN LIFE IN FIELDS OTHER THAN POLLUTION. PURVEYORS OF LIFE INSURANCE HAVE DEVELOPED THIS TO A FINE ART. IN MEDICAL SCIENCE, WHERE LIMITED RE-

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SOURCES FOR SAVING LIFE MAY HAVE TO BE ALLOCATED, THE VALUE OF ONE LIFE AGAINST ANOTHER MUST BE ASSESSED - THE SELECTION OF PATIENTS FOR KIDNEY DIALYSIS. AND CERTAIN TYPES OF HEART SURGERY ARE EXAMPLES. HERE DETAILED KNOWLEDGE OF EACH INDIVIDUAL CAN BE BROUGHT TO BEAR.

6. IN THE CASE OF TRAFFIC ENGINEERING. A DIFFERENT SET OF VALUES HAS TO BE USED. THE COST OF TRAFFIC ACCIDENTS

CAN BE ASSESSED IN TERMS OF THE COST OF INJURY, DAMAGE TO THE VEHICLES INVOLVED, LOSS OF EARNINGS. LOSS OF CONSUMPTION, INSURANCE AND THE COST OF THE PUBLIC SERVICES EMPLOYED. IN CONJUNCTION WITH ACCIDENT STATISTICS, THE ESTIMATED 'COST' OF AN ACCIDENT CAN BE USED TO ASSESS THE EXPENDITURE WHICH IS JUSTIFIED TO IMPROVE. SAY. A DANGEROUS ROAD JUNCTION.

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SS-15 TRSE-00 USIA-15 FEAE-00 ERDA-07 CG-00 AF-06

ARA-10 EA-09 NEA-10 IO-13 ERDE-00 EURE-00 /161 W

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P R 141819Z APR 76

FM AMEMBASSY LONDON

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7. WHEN CONSIDERING THE IMPACT OF POLLUTION, THE TARGET GROUP IS OFTEN UNKNOWN AND THE HUMAN 'COST' UNQUANTIFIABLE. IT WOULD, OF COURSE, BE POSSIBLE TO ESTIMATE THE IMPAIRMENT OF ENVIRONMENTAL QUALITY IN TERMS OF THE COST OF THE WORK REQUIRED TO RESTORE IT TO ITS FORMER STATE. HOWEVER, WHEN A PLANT OR ANIMAL SPECIES IS DAMAGED OR DRIVEN TO EXTINCTION. OR A HUMAN LIFE IS IMPAIRED, PERHAPS MANY YEARS AFTER EXPOSURE, HOW CAN ONE QUANTIFY SUCH A LOSS?

8. WHAT RISK IS ACCEPTABLE TO THE PUBLIC AND GOVERNMENT? IN REAL LIFE, HOWEVER, GOVERNMENTS DO HAVE TO TAKE DECISIONS, OFTEN WITHOUT DETAILED SCIENTIFIC EVIDENCE, ON THE CONTROL OF ENVIRONMENTAL POLLUTANTS. THESE MUST BE INFLUENCED BY THE DEGREE OF RISK WHICH IS ACCEPTABLE TO THE PUBLIC. AMERICAN STUDIES INDICATE THAT THE ACCEPTANCE OF VOLUNTARY RISK IS 1,000 TIMES GREATER THAN THE ACCEPTANCE OF INVOLUNTARY RISK. THIS FINDING IS RE-UNCLASSIFIED

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FLECTED TO SOME EXTENT IN ESTIMATED FIGURES WHICH SUGGEST THAT THERE WERE MANY TIMES MORE DEATHS ON THE ROAD THAN ATTRIBUTABLE TO POLLUTION; BY CONTRAST, RESEARCH EFFORT INTO ROAD SAFETY WAS ONLY TWICE THAT ON POLLUTION.

9. IN SUCH WAYS PUBLIC OPINION CONTRIBUTES ITS OWN EVALUATION OF ACCEPTABLE RISK - OUR SECOND QUESTION (PARA 4). IN ANSWER TO OUR FIRST - THE ASSESSMENT OF POTENTIAL HAZARD - IS DEPENDENT ON PAINSTAKING SCIENTIFIC EVALUATION. DATA ON HUMAN HEALTH OR ON THE BIOSPHERE AND ITS INTERRELATIONSHIPS, AND DATA ON POLLUTANT LEVELS HAS TO BE GENERATED. COLLECTED, COLLATED AND APPRAISED. IF AND WHEN A DOSE-RESPONSE RELATIONSHIP HAS BEEN EVALUATED FOR THE EFFECTS OF A GIVEN POLLUTANT IN ANIMAL STUDIES. AN ACCEPTABLE OR TOLERABLE LEVEL IN THE ENVIRONMENT MAY POSSIBLY BE SUGGESTED.

10. DOSE-RESPONSE RELATIONSHIPS IN MOST CASES CANNOT BE CLEARLY DEFINED BECAUSE V LACK OF DATA OR OF KNOWLEDGE OF MECHANISM, AND THERE IS ALWAYS SOME RESIDUAL AREA OF RISK. IT IS VERY DIFFICULT TO EXTRAPOLATE RESULTS FROM A LABORATORY STUDY IN ANIMAL SPECIES TO MAN IN THE ENVIRONMENT. THE PROBLEM WHICH CAUSES THE GREATEST DIFFICULTY IS GAUGING WHERE IN THE AREA OF RESIDUAL RISK THE THRESHOLD OF ACCEPTABILITY SHOULD BE PLACED. AS HAS ALREADY BEEN POINTED OUT, PUBLIC TOLERANCE OF A HAZARD IS VARIABLE.

11. A CASE IN POINT IS PERHAPS A SUBSTANCE WHICH HAS BEEN SHOWN TO BE CARCINOGENIC IN ANIMALS, BUT FOR WHICH THERE IS NO EVIDENCE OF TUMOR CAUSATION IN MAN OVER MANY YEARS OF USE. THIS SURELY POSES A REAL ENOUGH DILEMMA. ONE COUNTRY MAY CHOOSE A COURSE WHICH PROHIBITS THE USE OF SUCH A SUBSTANCE REGARDLESS OF OTHER FACTORS; OTHER NATIONAL AUTHORITIES MAY HAVE DIFFERENT RESPONSES. POLICY WILL INEVITABLY VARY FROM COUNTRY TO COUNTRY DEPENDING ON THEIR SCIENTIFIC ADVICE, PUBLIC OPINION, HISTORICAL AND ECONOMIC FACTORS, TRADITION AND MANY OTHER ELEMENTS.

12. SHOULD WE USE THE "BEST PRACTICABLE MEANS"? IN
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FACT DECISIONS HAVE TO BE TAKEN WITHOUT SUFFICIENT INFORMATION EITHER ON A PUTATIVE CARCINOGEN OR A MINOR NUISANCE. POLLUTION HAS TO BE CONTROLLED BY WHATEVER MECHANISMS SEEM APPROPRIATE. IN SOME CASES PROBLEMS CAN BE SOLVED QUITE SIMPLY BY RESITING A POLLUTING SOURCE AWAY FROM HUMAN HABITATION AND ENVIRONMENTS WHICH MAY BE DAMAGED BY ITS ACTIVITIES. AS SUCH POLLUTION CONTROL HAS INCREASINGLY TO BE CONSIDERED AS AN ASPECT OF LAND USE PLANNING. IT IS CLEARLY NOT ALWAYS POSSIBLE TO SITE EMITTERS SUCH THAT THEY DO NOT IMPINGE UPON THE COMMUNITY. AND IS LIKELY TO BECOME EVEN LESS SO IN THE FUTURE. IN THE UK. OVER A PERIOD OF YEARS, A CONCEPT OF 'BEST PRACTICABLE MEANS' HAS DEVELOPED TO DEAL WITH POLLUTION, PARTICULARLY WITH REGARD TO ATMOSPHERIC POLLUTION.

13. 'PRACTICABLE' IN THIS CONTEXT MEANS 'REASONABLY PRACTICABLE HAVING REGARD TO LOCAL CONDITIONS, CURRENT TECHNICAL KNOWLEDGE AND FINANCIAL IMPLICATIONS.' THE 'MEANS' CAN INCLUDE MODIFICATION OF DESIGN, INSTALLATION, MAINTENANCE AND OPERATION OF A PLANT AS WELL AS EFFLUENT CONTROL. DISCHARGES ARE CONTROLLED NOT ONLY BY LIMITING THEIR OUTPUT, BUT BY RENDERING THEM AS INOFFENSIVE OR AS HARMLESS AS PRACTICABLE. THIS CONCEPT IS MOST CLEARLY DEVELOPED AND APPLIED IN THE FIELD OF AIR POLLU-

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MRN: 1976LONDON005831 SEGMENT NUMBER: 000003 ERROR READING TEXT INDEX

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MRN: 1976LONDON005831 SEGMENT NUMBER: 000004 ERROR READING TEXT INDEX

FILE; TELEGRAM TEXT FOR THIS SEGMENT IS UNAVAILABLE

Message Attributes

Automatic Decaptioning: X
Capture Date: 01 JAN 1994
Channel Indicators: n/a
Current Classification: UNCLASSIFIED
Concepts: n/a
Control Number: n/a
Copy: SINGLE
Draft Date: 14 APR 1976
Decaption Date: 01 JAN 1960
Decaption Note:
Disposition Action: n/a
Disposition Approved on Date:
Disposition Authority: n/a
Disposition Case Number: n/a
Disposition Comment:
Disposition Date: 01 JAN 1960
Disposition Event:
Disposition History: n/a
Disposition Reason:
Disposition Remarks:
Document Number: 1976LONDON05831
Document Source: CORE
Document Unique ID: 00
Drafter: n/a
Enclosure: n/a
Executive Order: N/A
Errors: CORE1
Film Number: n/a
From: LONDON
Handling Restrictions: n/a
Image Path:
ISecure: 1
Legacy Key: link1976/newtext/t19760460/aaaabytm.tel
Line Count: 266
Locator: ADS TEXT UNRETRIEVABLE
Office: ACTION EUR
Original Classification: UNCLASSIFIED
Original Handling Restrictions: n/a
Original Previous Classification: n/a
Original Previous Handling Restrictions: n/a
Page Count: 5
Previous Channel Indicators: n/a
Previous Classification: n/a
Previous Handling Restrictions: n/a
Reference: 76 STATE 81206
Review Action: RELEASED, APPROVED
Review Authority: oatisao
Review Comment: n/a
Review Content Flags:
Review Date: 29 JUN 2004
Review Event:
Review Exemptions: n/a
Review History: RELEASED <29 JUN 2004 by SilvaL0>; APPROVED <01 SEP 2004 by oatisao>
Review Markings:

Margaret P. Grafeld
Declassified/Released
US Department of State
EO Systematic Review
04 MAY 2006

Review Media Identifier:
Review Referrals: n/a
Review Release Date: n/a
Review Release Event: n/a
Review Transfer Date:
Review Withdrawn Fields: n/a
Secure: OPEN
Status: NATIVE
Subject: CCMS: APRIL 27-28, 1976 PLENARY SESSION: UK ROUND TABLE REPORT
TAGS: ENRG, SENV, UK, CCMS
To: SECSTATE WASHDC NATO BRUSSELS
Type: TE
Markings: Margaret P. Grafeld Declassified/Released US Department of State EO Systematic Review 04 MAY 2006